

**SOUTHWEST LOCAL WORKFORCE DEVELOPMENT BOARD**

1527 White Avenue  
Henderson, TN 38340  
(731) 989-5111

**Effective Date: June 19, 2018**

**Duration: June 30, 2020**

**Workforce Services Policy – Individual Training Accounts Southwest LWDB - WIOA (17-11)**

**Subject:**

Individual Training Accounts (ITA)

**Purpose:**

The purpose of this memorandum is to establish the policy of SOUTHWEST LWDB regarding Individual Training Accounts for individuals enrolled in the Workforce Innovation and Opportunity Act (WIOA) who are attending post-secondary training.

**References:** WIOA Section 134(c)(3)(F)(iii); WIOA Section 3(7)(B); 20 CFR 680.320(a)(3); 20 CFR 680.340(f); WIOA Section 122(d); TDLWD AJC Individual Training Account Use Guidance

**Background:** WIOA identifies the Individual Training Account (ITA) as the primary means of providing training to eligible individuals (as defined by the Workforce Innovation and Opportunity Act) and who are not able to obtain grant assistance from other sources or require WIOA assistance in addition to other sources of grant assistance. The ITA system is designed to provide customer choice within the guidelines established by the SOUTHWEST LWDB.

**Policy:**

The West Tennessee Workforce Development Board in SOUTHWEST LWDA has established the following guidelines regarding the authorization of funds through Individual Training Accounts, *if funds are available:*

- Who Receives Training Services?  
Upon completion of an interview, evaluation, assessment, or career planning by an AJC staff person, it is determined the participant is:
  - Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to, or higher than, wages from previous employment through career services
  - In need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to, or higher than, wages from previous employment through career services

- To have the skills and qualifications to participate successfully in training services
- Recipients of public assistance and other low-income individuals who are basic skills deficient will be given priority in receipt of individual training accounts (ITAs) for post-secondary education. (Please refer to SOUTHWEST LWDB Policy # 17-9, Change 1 regarding more in-depth information regarding priority of services.)
- ITA Limitations
  - A maximum of \$3,500 in WIOA funding may be available in a twelve-month period with a maximum of \$7,000 available over a 24-month period to be used for tuition, fees, books, and required supplies.
  - If other financial assistance is available (excluding loans), it must be applied to **tuition, fees, books, and supplies** prior to WIOA funds being expended. Should other financial assistance not yet be in place at the time of enrollment into the training, WIOA funds may be issued to cover cost of books and supplies.
- Fund Distribution
  - WIOA funding will be authorized for a period of a maximum of two years of training for necessary unmet needs for the training taking into account that WIOA funds are available.
  - WIOA funds will be issued at the beginning of each new term of the program of training.
  - Charges beyond the training period will not be covered unless the training institution has a refund policy
- Types of Training Allowed
  - Training must be in a demand occupation area within the West Tennessee area.
  - WIOA funds will only be issued for training in programs that are listed on the state Eligible Training Provider List (ETPL). Participant access to this list is provided through the jobs4tn website in which the AJC staff person will instruct and assist the participant on how to obtain the list of providers and the programs offered. Participant will be made aware that he/she will have the final choice in choosing the provider he/she wishes to attend.
  - "Career Pathway" programs that lead to improved employment opportunities.
- Non-Attendance In Training
  - Should the customer miss training for a consecutive 30-day period, other than for an approved medical leave or emergency leave, the ITA will be cancelled and all remaining funds will be de-obligated. Documentation of medical or emergency leave must be provided to the assigned Career Specialist.
- Additional Customer Requirements
  - Must demonstrate through assessment results (i.e.: TABE, KeyTrain, college entrance exams) the basic skill sets to successfully complete training and obtain employment in the proposed occupation.
  - Must receive satisfactory grades/progress (determined by the training facility) and provide this information to the assigned Career Specialist in order to continue receiving funding. Should satisfactory grades not be obtained, customer will be placed on probation for the next term. Customer may return to training the next term; but if unsatisfactory grades/progress are made in term of return, customer will not receive funding for next term.
  - Must have acceptable attendance as defined by training provider.
  - Must maintain (at least monthly) contact with assigned Career Specialist.
  - Must be enrolled in and attend training for all terms until completion of training program.

- Availability of Funds/Waiting List
  - SOUTHWEST LWDB reserves the right to enforce an ITA waiting list for Adult and/or Dislocated Worker ITAs due to availability of funding.
- WIOA Funding Restrictions – WIOA funds will be issued for the following:
  - Medical or dental procedures (excluding required exams for training)
  - Lost books or supplies or books / required supplies for repeat classes
  - Classes that must be repeated
  - Any training that requires more than two years to complete
- Modifications of ITA
 

Requests to increase an ITA may be approved on a case-by-case basis at the discretion of the assigned Career Specialist.

It is recognized there is limited exceptions to the use of ITAs. Contracts for services may be used instead of an ITA only when one or more of these exceptions apply (WIOA Section 134(c)(3)(G)(ii)):

- The services provided are OJT, customized training, incumbent worker training, or transitional jobs
- SOUTHWEST LWDB determines there are an insufficient number of Eligible Training Providers in the local area to accomplish the purpose of a system of ITAs
- SOUTHWEST LWDB determines there is a training-services program of demonstrated effectiveness offered by a community-based organization or other private organization to service individuals with barriers to employment
- SOUTHWEST LWDB determines the most appropriate training can be provided by an institution of higher education to train multiple individuals for jobs in sector-demanded occupations, provided this does not limit customer choice
- SOUTHWEST LWDB is considering entering into a pay-for-performance contract and the local area ensures that the contract is consistent with 20 CFR 638.510.

Should a community-based organization or other private organization be considered regarding exceptions to the use of ITAs , in order to determine the effectiveness of the agency, particularly as it applies to the special participant population to be served, the following criteria will apply:

- Financial stability of the organization
- Demonstrated performance in measures appropriate to the program
- The relevance of the specific program to our local area’s needs that have been identified

Opportunities with the Tennessee Reconnect program will be considered prior to determination of an ITA.

**Action:**

All American Job Center staff will make customers aware of potential benefits and assist in making an informed decision about employment and training options. Exceptions to this policy must be approved by the SOUTHWEST LWDB Director or designee on a case-by-case basis.

**Contact:**

Questions regarding this policy should be addressed to Jimmy Bell, Southwest LWDB Director, at SWHRA, 1527 White Avenue, P.O. Box 264, Henderson, TN 38340. Phone: (731) 983-3688. Email: [jbell@swhra.org](mailto:jbell@swhra.org).



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Craig S. Butler, Board Chairman

**SOUTHWEST LOCAL WORKFORCE DEVELOPMENT BOARD**

**1527 White Avenue  
Henderson, TN 38340  
(731) 989-5111**

**Effective Date: October 1, 2018**

**Duration: June 30, 2020**

**Workforce Services Policy – Eligible Training Provider List - WIOA (18-1)**

**Subject:**

SOUTHWEST LWDA Eligible Training Provider List (ETPL)

**Purpose:**

The purpose of this memorandum is to provide information and direction regarding the Eligible Training Provider process, eligibility, application procedures, the appeal process, dissemination of the list, and reporting requirements.

**References:** 20 CFR 663.530; 20 CFR 680.490; 20 CFR 683.630(b); TEGL 14-14; WIOA Section 107(g)(1); WIOA Section 107(h)(1); WIOA Section 167(i); WIOA Section 122(b)(1)(A); WIOA Section 122(b)(1)(E); WIOA Section 122(b)(2); WIOA Section 122(b)(2)-(b)(4)(D); WIOA Section 122(b)(4)(C)-(E); WIOA Section 122(c)(1); WIOA Section 122(c)(2); WIOA Section 122(d); WIOA Sections 122(d)(1) and (d)(3); WIOA Section 122(f)(1)(C); WIOA Section 122(g); WIOA Section 122(f)(1)(B); WIOA Section 134(c)(3)(E)

**Background:**

WIOA requires states to establish a list of training providers who are eligible to receive WIOA funds and to establish procedures for initial eligibility and subsequent eligibility.

**Policy:**

SOUTHWEST LWDB agrees to maximize customer choice and assure that all significant population groups are served through utilizing the following process regarding Eligible Training Providers.

Action:

1. Eligible Training Provider Access:

A. How to Apply to Become an Eligible Training Provider:

The following are the steps for ETPL placement in the State of Tennessee:

- i. The State will develop the procedures and a system for disseminating the ETPL (WIOA Sections 122[d][1] and [d][3]) and the Local Workforce Development Board (LWDB) must make these procedures available to ETPs.
- ii. Prospective ETPs must submit initial eligibility criteria including: training services to be offered, information addressing alignment of the training services with in-demand industry sectors and occupations to the extent possible, performance and cost information, and annually met performance levels on specified performance measures as required.
- iii. Minimum performance levels are established by the State. The LWDB may require higher levels on specified performance measures or may require additional measures and corresponding levels. (SWLWDB will utilize the performance levels established by the State.)
- iv. The State receives the information on approved ETPs by LWDBs. The State then compiles a single list (the ETPL) and disseminates the ETPL with performance and cost information to each LWDB.
- v. Participants utilizing an Individual Training Account (ITA) will have the opportunity to select any of the approved ETPs and programs on the ETPL (WIOA Section 122[d]).
  - a) While participants can select from the complete ETPL, State and SWLWDB policies determine the funding amounts for each program. Thus, SWLWDB may choose not to fund certain categories of training programs based on, but not limited to, the following reasons:
    - Lack of occupational demand for SWLWDB
    - High tuition cost in comparison to comparable programs
    - Lack of a livable wage upon program completion

B. Training Provider Eligibility (TEGL 41-14):

To be eligible to receive funds, the training provider must meet at least one of the following requirements:

- i. A postsecondary educational institution that is eligible to receive Federal funds under Title IV of the Higher Education Act of 1965 (20 U.S.C. 1070 et. Seq.) and provides a program that leads to an associate degree, baccalaureate degree, or certificate.
- ii. An entity that carries out programs under the National Apprenticeship Act of August 16, 1937; 50 Stat. 664, Chapter 663; 29 U.S.C. 50 et.seq.
- iii. Another public or private provider of a program of training services for the general public or specialized training for participant populations that face multiple barriers to employment such as providers directly associated with the Division of Rehabilitation Services, TN Department of Human Services. These populations include the following categories: low-income individuals with barriers to employment and people with disabilities.
- iv. LWDBs if they meet the conditions of WIOA Section 107(g)(1)

- v. Another public or private provider with demonstrated effectiveness providing training to a population that faces multiple barriers to employment. These populations include:
  - a) Displaced homemakers
  - b) Low-income individuals
  - c) Indians, Alaskan natives, and native Hawaiians, as such terms are defined in WIOA Section 166(b)
  - d) Individuals with disabilities, including youth who are individuals with disabilities
  - e) Older individuals
  - f) Ex-offenders
  - g) Homeless individuals (as defined in Section 41403(6) of the Violence Against Women Act of 1994 [42 U.S.C. 1404e-2(6) as amended in 2013]; or homeless children and youths (as H.R. 803 – 10 defined in Section 725[2] of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 1143a[2] and Section 721).
  - h) Youth who are in or who have aged out of the foster care system
  - i) Individuals who are English language learners, including individuals who have low levels of literacy and individuals facing substantial cultural barriers
  - j) Eligible migrant farmworkers, as defined in WIOA Section 167(i), and services to other low-income individuals
  - k) Individuals within two (2) years of exhausting lifetime eligibility under Part A of Title IV of the Social Security Act (42 U.S.C. 601 et. Seq.)
  - l) Single parents (including single pregnant women)
  - m) Long-term unemployed individuals
  - n) Other groups the Governor determines to have barriers to employment (WIOA Section 134[c][3][E])

C. Program of Training:

A program of training services should consist of one (1) of the following:

- i. One (1) or more courses or classes that, upon successful completion, leads to a certificate, an associate degree, or baccalaureate degree, or a competency or skill recognized by employers;
- ii. A training regimen that leads to competitive integrated employment for individuals with disabilities that provides individuals with additional occupational skills or competencies generally recognized by employers; or
- iii. Identical programs offered in different locations by the same training provider must be considered as one program, and will not require separate applications unless the regulatory agency uses location as a factor in defining a unique program.

D. ETPLL Exceptions:

The following activities are exempt from utilizing the ETPL process.

- i. On-the-Job Training and Customized Training (as defined by WIOA)
  - a) Skill enhancement and workplace literacy are considered to be short-term prevocational and, therefore, are not defined as training services for the purposes of this policy.
  - b) Short-term prevocational services are not tied to a specific occupation and include course-like services such as Literacy and Adult Basic Education, Workplace Literacy, introductory computer classes, as well as development of learning skills, communication skills, interviewing skills, punctuality training, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment or training.
  - c) Community-based organizations and other private organizations providing training.

E. Registered Apprenticeship Programs (TEGL 41-14):

- i. Registered Apprenticeship Programs are not subject to the same application, performance information requirements, or period of initial eligibility procedures as other providers because such programs have gone through a detailed application and vetting procedure to become Registered Apprenticeship programs, sponsored by the United States Department of Labor.
- ii. In collaboration with the State Director of Apprenticeship, the State will contact all current program sponsors to elicit their interest in being part of the ETPL. The goal is to place as many Registered Apprenticeship Programs on the ETPL as possible.
- iii. In collaboration with the State Director of Apprenticeship, the State will ascertain at least every two (2) years those ETPs that have lost their registration status.
- iv. The State will work in collaboration with the State Director of Apprenticeship to develop a simplified process for new Registered Apprenticeship programs to become part of the ETPL.
- v. Minimal information is required for Registered Apprenticeship programs for ETPL placement. The information required is outlined below:
  - a) Occupation(s) included within the registered apprenticeship program,
  - b) Name and address of the Registered Apprenticeship program sponsor,
  - c) Name and address of the provider of related instruction, including location of instruction if different from program sponsor's address,
  - d) Method and length of instruction, and
  - e) Number of active apprentices
- vi. Program sponsors that do not provide the related instruction component of a Registered Apprenticeship program may be required to provide additional information about their education provider, including the cost of instruction. This is the only time that cost information will be required for Registered Apprenticeship programs.
- vii. Registered Apprenticeship programs are exempt from performance and reporting-related requirements in order to enable these evidence-based programs to be placed on the ETPL with minimum burden.
- viii. Registered Apprenticeship programs with openings for new apprentices will automatically be considered a statewide demand occupation to facilitate WIOA funding support as appropriate.
- ix. A Registered Apprenticeship program on the ETPL will be available to every Local Workforce Development Area (LWDA) in the State.
- x. The only criterion that applies to apprenticeships is that they be registered as apprenticeship programs with the U.S. Department of Labor.

2. Initial Eligibility and Application Procedures

A. Initial Eligibility:

- i. All training providers are required to complete the online application in order to be included on the statewide ETPL. The online application is reviewed by the LWDB to make the determination about placement onto the ETPL. After the SWLWDB votes to add the provider/program to the ETPL, it is then sent to the State for final review.

B. ETPL Application Procedure for All Prospective Eligible Training Providers Except Registered Apprenticeship Programs:

- i. Applications for initial eligibility must be initiated by the training provider by completing an online New Provider Application (WIOA Section 122[b][4][C]-[E]).
- ii. The online application is first submitted to SWLWDB for verification of completeness.
- iii. SWLWDB will verify that the training provider is in compliance with all Tennessee regulations pertaining to training authorization.
- iv. In addition, SWLWDB is required to verify that all of the required data elements for the ETP are complete before submitting application for consideration.
  - a) If the ETP is not compliant or the application is incomplete, SWLWDB will notify the training provider within fifteen (15) days of receiving the application and prepare the application to be reviewed at the next SWLWDB meeting.
  - b) If the ETP is compliant and its application is complete, SWLWDB will review the application within five (5) days of receipt of the necessary information.
  - c) SWLWDB cannot send WIOA participants to new training providers until they are approved by a LWDB and the State office has been notified of the approval of the new provider.
- v. SWLWDB will ensure that the ETP meets their local eligibility criteria and then will vote to decide if the ETP and the associated programs will be added to the ETPL.
- vi. ETPs must supply any supplemental information requested by SWLWDB to assist in the initial eligibility decision.
- vii. Applications must submit a printed version of the online application before the SWLWDB. If there is no Board meeting scheduled within three weeks, SWLWDB staff will call a special Executive Committee meeting to vote regarding adding the provider /program to the ETPL.
- viii. After SWLWDB votes on the ETP's application, a written notification will be submitted to the State within thirty (30) days of the decision to add or deny the training provider placement on the ETPL.

C. Out-of-State Providers, Except Registered Apprenticeship Programs:

- i. ETPs that are headquartered outside of Tennessee who do not have in-state training facilities may apply to any LWDB where they wish to provide services. Applications must include all information required by these policies.
- ii. Reciprocal Agreements (WIOA Section 122[g]). SWLWDB can send a Tennessee WIOA participant to a provider located in a different State given that the training provider appears on the other State's ETPL.
- iii. Reciprocal Agreements are subject to the following guidelines:
  - a) Use of an out-of-state provider as part of a reciprocal agreement does not assure the ETP placement on the Tennessee ETPL.
  - b) If the ETP wants to appear on the Tennessee ETPL, it must complete the process for becoming an approved Tennessee ETP.
  - c) Should SWLWDB utilize a training provider that does not appear on the Tennessee ETPL, it will be the responsibility of SWLWDB to track and report the necessary performance information needed for subsequent eligibility determinations. To fulfill this obligation, SWLWDB will ensure that verification of enrollment, completion, and subsequent placement for ETPs are recorded in the State performance tracking system (currently Virtual One-Stop Data Management Tracking System [VOS]).

D. Out-of-Area Providers, Except Registered Apprenticeship Programs:

- i. If an ETP has a physical presence in the State, its ETPL application must be submitted to the LWDB covering the area where that training provider is headquartered or has its main campus.
- ii. Any LWDB can approve a satellite site for a training program so long as that training provider and program have been first approved by the LWDB in which the provider is headquartered.
- iii. Local Workforce Development Boards can approve training providers for the State ETPL when the training provider does not have a permanent training structure anywhere in Tennessee; in such a case, such providers are treated as out-of-state training providers.

3. Appeal of Local Workforce Development Board Denial

A. Provider Application Denial:

- i. If SWLWDB denies an ETP's initial application for listing on the ETPL, SWLWDB, within thirty (30) days from the date of determination, inform the ETP in writing, including the detailed reason(s) for denial and complete information on the appeal process.

B. Reasons for Denial of Application for Initial Eligibility:

- i. SWLWDB or the State may deny eligibility if the application from an ETP is not complete or not submitted within the required time frame.
- ii. SWLWDB or the State may deny eligibility if an applicant fails to meet the minimum criteria for initial listing specified in this policy (WIOA Section 122[c][1]).
- iii. SWLWDB may deny eligibility if the training programs offered by the ETP do not lead to gainful employment in in-demand occupations as determined by a labor market analysis.
- iv. SWLWDB may deny eligibility if the training program demographics (i.e. cost and length) are substantially higher (beyond fifty percent [50%] than previously approved programs offering the same credential (within the past two [2] program years).
- v. SWLWDB or the State may deny eligibility if it is determined that the applicant intentionally supplied inaccurate information (WIOA Section 122[f][1][B]).
- vi. SWLWDB or the State may deny eligibility to a training provider who has been found to have substantially violated any WIOA requirements (WIOA Section 122[f][1][B]).

C. Appeals to the Local Workforce Development Board (WIOA Section 122[c][1]):

This procedure applies to appeals by ETPs to SWLWDB based on the denial of an ETP's application for the initial listing on the ETPL.

- i. A Provider wishing to appeal a decision by the Southwest Tennessee Workforce Development Board must submit an appeal to the Local Board within 30 days of the issuance of the denial notice. The appeal must be in writing and include a statement of the desire to appeal, specification of the program(s) in question, the reason(s) for the appeal (i.e. grounds), and the signature of the appropriate Provider official.
- ii. The provider will be granted the opportunity to directly address the reasons for denial either in writing or through an appeal hearing.
- iii. SWLWDB will have three (3) impartial appeal officers who will be responsible for re-evaluating the supplemental materials supplied by the Provider in addressing the initial reasons for denial.
- iv. SWLWDB will notify the Provider of its final decision on an appeal within thirty (30) days of receipt of the appeal.
- v. In the event that the Provider is not satisfied with the outcome of the appeal process of SWLWDB, an appeal may be submitted to the State.

D. Appeals to the State (WIOA Section 122[c][1]):

This procedure applies only to ETPs who have exhausted the appeal process of SWLWDB and are dissatisfied with SWLWDB's final decision.

- i. A Provider wishing to appeal to the State must submit an appeal request to the State within thirty (30) days from SWLWDB's notification to the Provider of their final decision on an appeal. The request for an appeal to the State must be in writing and include a statement of the desire to appeal, specification of the program(s) in question the reason(s) for the appeal (i.e. grounds), and the signature of the appropriate Provider official.
- ii. The state will promptly notify SWLWDB when it receives a request for appeal. The State will also notify SWLWDB when it makes the final decision on an appeal.
- iii. The State appeal process includes the opportunity for appealing Providers to have a hearing. The hearing officer must be an impartial person. The hearing officer must provide written notice to the concerned parties of the date, time, and place of the hearing at least ten (10) calendar days before the scheduled hearing. Both parties must have the opportunity to present oral and written testimony under oath; to call and question witnesses, to present oral and written arguments to request documents relevant to the issue(s) and to be represented.
- iv. The five (5) member State appeals committee, chaired by the hearing officer, will administratively review the appeal, make a preliminary decision and notify the Provider and SWLWDB. The committee can either uphold or reverse SWLWDB's decision. The State appeals committee must render a decision within sixty (60) days from receiving the Provider's initial State appeal request.

4. Dissemination of the ETPL

A. Statewide Dissemination and Customer Access:

- i. The State will ensure that the ETPL is accurate and current. The State must ensure that the updated list is available to all LWDBs (WIOA Section 122[d][1]) and to the general public through the State website wherever internet service is available.
- ii. SWLWDB is responsible for ensuring that all American Job Center (AJC) staff members have access to the ETPL, and are knowledgeable about utilizing the ETPL; SWLWDB will also ensure local access to the ETPL is made available for customers within the ADJCs (WIOA Section 122[d][1]).
- iii. SWLWDB is also responsible for ensuring that all American Job Center staff do not allow WIOA participants to enroll in programs that do not appear on the ETPL.

5. Program Changes

A. Adding New Programs (Previously Approved Providers):

- i. The ETP must submit the program using the online web application for addition to the ETPL.
- ii. The application materials are received electronically by SWLWEDB and reviewed for completeness.
  - a) All new programs must have prior authorization by the appropriate State authorizing agency (Tennessee Higher Education Commission, Tennessee Board of Regents, etc.) before they can be added to the ETPL.
- iii. After verification of completeness, the application materials are forwarded to SWLWDB for its vote on whether to add the program to the ETPL.
- iv. After SWLWDB has rendered a vote about the application materials, its decision is communication in writing to the State.
- v. All approvals from the SWLWDB are added to the ETPL by the State within three (3) business days.

B. Adding New Registered Apprenticeship Programs:

Registered Apprenticeship sponsors that want to add new programs to the ETPL must indicate their interest in being included on the list and must use the online web application to submit their programs.

C. Making Changes to Program Information:

- i. Revision(s) to already approved and existing program curriculums must first be approved by the appropriate State authorizing agency (Tennessee Higher Education Commission, Tennessee Board of Regents, etc.).
- ii. The Eligible Training Provider must submit the proper forms using the online web application to make changes on the ETPL.
- iii. Changes submitted by the ETP are subject to review by the Operator and the State.
  - a) Changes in program cost or length that are beyond twenty-five percent (25%) must be resubmitted to SWLWDB for approval as a new program.
- iv. It is the responsibility of the ETP to ensure that information displayed on the ETPL is accurate.
  - a) ETPs with inaccurate information on the ETPL as discovered in conjunction with a Data Validation review or a Data Accuracy Report are subject to removal from the ETPL for a set suspension period or until all information is corrected (whichever occurs later).

D. Removing Programs from the ETPL:

- i. Any time after the initial program approval by SWLWDB, the ETP (including Registered Apprenticeship Programs) can request to have a program removed from the ETPL.
- ii. If a program is removed from the ETPL, with the exception of Registered Apprenticeship programs, the ETP is still required to submit quarterly performance reports until the last WIOA training participant completes or withdraws from the program.
- iii. Failure to submit the remaining quarterly performance reports will subject the ETP to the penalties detailed in Section 9 of this policy.
- iv. If at any point after initial approval training is temporarily not offered or is permanently deleted from the ETP's selection of the programs, it must be removed from the ETPL within thirty (30) days of the institutional decision.

6. Performance Data (Registered Apprenticeship Programs are Excluded):

A. Provider Quarterly Report Requirements:

- i. ETPs must provide the information necessary to determine program performance and to meet other requirements of the WIOA. The ETP must agree to make available verifiable data to validate any information submitted (WIOA Section 122[d][1]).
- ii. ETPs on the ETPL are required to submit quarterly performance reports to the State. The report must contain individual-level data for all participants in programs offered by the ETP that have serviced at least one (1) student with the assistance of WIOA funding.
- iii. The reports are due to the State on the specified due dates.
  - a) Quarterly report due dates: January 15<sup>th</sup>, April 15<sup>th</sup>, July 15<sup>th</sup> and October 15<sup>th</sup> of every year.
  - b) In the event that the due date falls on a State holiday or a weekend, reports are due by the conclusion of the next business day.

## 7. Subsequent Eligibility Determination:

### A. Subsequent Eligibility:

- i. All programs approved for initial eligibility by SWLWDB must be reviewed annually by the Board. Subsequent eligibility requirements under WIOA apply to ETPs transitioning to WIOA Title IB who were previously eligible under WIA Title I and new ETPs that were determined to be initially eligible under WIOA to determine their continued eligibility to remain on the ETPL. This determination is called "Subsequent Eligibility" (WIOA Section 122[c][2] and 20 CFR 663.530) until changed to WIOA.
- ii. Subsequent eligibility determinations are made on an annual basis using the performance data supplied quarterly by the ETP.
- iii. Only those programs with a minimum of ten (10) WIOA students enrolled during the reporting year are considered for subsequent eligibility decisions.
- iv. Any program that fails to meet the minimum performance standards, as established by the State, will be removed from the ETPL for a minimum period of one (1) program year.
- v. The State compiles and disseminates an annual Subsequent Eligibility Report. The report is posted for public viewing online through the ETPL website.
- vi. ETPs receive the opportunity to review and correct their performance information prior to Subsequent Eligibility decisions and public dissemination of the report.
- vii. The State adheres to the following guidelines when displaying performance data for each provider:
  - a) All programs with a minimum of one (1) WIOA participant during the reporting year will appear in the report.
  - b) For confidentiality purposes, only those programs with a minimum of ten (1) WIOA students enrolled during the reporting year have all their performance data displayed for public viewing.

### B. Failure to Meet Subsequent Eligibility:

- i. The State must remove a program if, as a result of the subsequent eligibility determination process, the program is found not to have met the minimum levels of performance set by the State (WIOA Section 122[b][1][A]).
  - a) If the State removes a program from the ETPL for subsequent eligibility reasons, the State must, within ten (10) days of its decision, inform the SWLWDB in writing and include the reason(s) for the removal.
- ii. Prior to removal by the State, SWLWDB must have the opportunity to submit supplemental performance data in efforts to keep the program on the ETPL. The types of supplemental data submitted may include information explained within WIOA Section 122(b)(1)-(b)(4)(D) and 20 CFR 680.490.
  - a) The specific economic, geographic, and demographic factors in the local areas in which training providers seeking eligibility are located; and
    1. The characteristics of those served by the eligible training providers seeking eligibility, including the demonstrated difficulties in serving such populations, where applicable.
- iii. Any program removed from the ETPL for subsequent eligibility reasons must remain off of the ETPL for a minimum of one (1) complete program year.
- iv. In order for the program to be added back to the ETPL, the ETP must re-apply through SWLWDB. Performance data is required as part of the application process for the time period when the program was removed from the ETPL.
- v. While a program is removed from the ETPL for subsequent eligibility reasons, the ETP cannot receive new training participants utilizing WIOA ITA funds for the removed programs.

## 8. Accuracy of Information:

### A. Data Validation:

- i. To ensure that accuracy and validity of the information supplied by Eligible Training Providers, the State conducts data validation visits at least once every year for all ETPs or as warranted by WIOA enrollment numbers.
  - a) During data validation visits, the State audits ETP files to verify previously submitted student, program, and provider information.
- ii. ETPs must meet the enrollment threshold before a data validation visit can occur. The enrollment threshold is as follows:
  - a) An ETP must have a minimum of fifteen (15) WIOA participants enrolled in its combined program offerings over a two (2) year period.
- iii. ETPs will receive at least a twenty-one (21) calendar-day advanced notice of the State's upcoming audit.
- iv. The ETPs must make available all files pertaining to WIOA participants covering the three (3) most recent program years.
- v. Each student file must contain documents to validate the following elements:
  - a) Proof of Enrollment
  - b) Program of Enrollment
  - c) Program Completion
  - d) Enrollment Date
  - e) Completion Date
  - f) Withdrawal Date (if applicable)
  - g) Credential Received
  - h) WIOA Participant Status
- vi. ETPs must also make available internal documents or sources to validate the following program elements:
  - a) Program Name
  - b) Program Length
  - c) Program Cost
  - d) Program Credential Offered
- vii. ETPs may be removed from the ETPL for a period of ten to ninety (10-90) days if the score they receive for data validation is not satisfactory.
- viii. If the State discovers evidence of intentionally misleading performance information, the ETP will be removed from the ETPL for a period of no less than two (2) years.
- ix. The State will notify SWLWDB of the audit findings within ten (10) days of auditing of an ETP within SWLWDB area.

## 9. ETPL Penalties:

### A. Removal of a Provider or Program on the ETPL:

- i. The State may remove a program if the ETP fails to submit all the data required for subsequent eligibility determination within the required time frames (WIOA Section 122[b][2]).
- ii. The State may remove a program if an ETP fails to notify the State of any program changes, including but not limited to, costs location of training, or change in State authorization status.
- iii. The State may remove a program at any point at which it is determined that the program does not meet the minimum criteria for initial listing specified in this procedure. For example, a program can be removed if its eligibility depended on accreditation, and the accreditation was lost (WIOA Section 122[b][1][E]).
- iv. The State may remove a program if it is determined that the applicant intentionally supplied accurate information.

- v. The State may remove a program if the ETP is found to have substantially violated any WIOA requirements.
  - vi. The State may remove a program or ETP if it loses its accreditation after an appeal process.
  - vii. The State may remove a program or ETP, at the request of SWLWDB, for any of the following reasons:
    - a) Unethical/illegal billing practices
    - b) Violations of Title VI of the Civil Rights Act of 1964; Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973; or the Act Discrimination Act 1975.
    - c) Lack of qualified training personnel or building infrastructure.
  - viii. The State must conduct an investigation prior to removing an ETP at the request of SWLWDB.
  - ix. The State may remove a program or ETP at the request of the institution.
    - a) If an eligible training provider requests removal from the ETPL for a particular program or for the institution as a whole, it can be reactivated on the ETPL within one (1) year assuming that it was in good standing when it was removed and no changes occurred in their program demographics during the removal period.
    - b) If an ETP whose self-requested removal is off the ETPL for a period of time greater than one (1) year, that training provider must re-apply for placement on the ETPL to SWLWDB.
- B. Suspension From the ETPL:**
- i. ETP may be suspended from the ETPL for any of the following actions:
    - a) Failure to submit quarterly performance reports or the exemption claim sheet by the deadlines
    - b) Failure to keep current the eligible training provider and program demographic information displayed on the ETPL
    - c) Failure to respond to a State request for a data validation visit
    - d) Poor performance during a data validation visit
    - e) Failure to submit corrections needed following quarterly report validation by the specified deadline
    - f) Failure to comply with State request for information
  - ii. During any State or Federal criminal investigation launched against the institution or key personnel at the institution, the ETP may be removed from the ETPL until a final resolution is reached. Depending on the final resolution, the provider may be permanently removed from the ETPL.
- C. Financial Reimbursement:**
- An ETP whose eligibility is terminated as a result of the reasons specified above in Section 7-Subsequent Eligibility Determination (A)(ii)-(vi) of the current policy for a program shall be liable for repayment of all funds received during any period of noncompliance (WIOA Section 122[f][1][C]).

**Contact:**

Questions regarding this policy should be addressed to Jimmy Bell, SOUTHWEST LWDB Director, at SWHRA, 1527 White Avenue, P. O. Box 264, Henderson, TN 38340. Phone: (731) 983-3688. Email: [jbelle@swhra.org](mailto:jbelle@swhra.org).



**Craig S. Butler, Board Chairman**

**SOUTHWEST LOCAL WORKFORCE DEVELOPMENT BOARD**

**1527 White Avenue  
Henderson, TN 38340  
(731) 989-5111**

**Effective Date: July 26, 2018**

**Duration: June 30, 2020**

**Workforce Services Policy – Support Services Southwest LWDB - WIOA (17-25), Change 1  
(Strikethrough deleted; highlights added)**

**Subject:**

WIOA Support Services

**Purpose:** The purpose of this policy memorandum is to establish policy regarding supportive services available for eligible WIOA participants.

**References:** 20 CFR 680.900; 20 CFR 680.950; 20 CFR 680.970; 20 CFR 681.570; WIOA Section 3(59); WIOA Section 106(c)(1)(F); WIOA Section 133; WIOA Section 133(b)(2)(B); WIOA Section 133(b)(3); WIOA Section 134(c)(3); WIOA Section 134(d)(3); WIOA Section 134(d)(4); WIOA Section 134(c)(1)(A)(ii); WIOA Section 134(c)(1)(A)(iii); Workforce Services Guidance – LWDA Supportive Services Policy Update Requirements - WIOA

**Background:**

Supportive services, such as transportation, child care, etc. are made available in order to enable an individual to participate in activities authorized under WIOA. All WIOA-eligible participants enrolled in Adult, Dislocated Worker, and Youth programs are eligible for supportive services as defined in WIOA Section 3(59). Supportive services are limited and must be leveraged with other local and state resources.

**Policy:**

The Workforce Innovation and Opportunity Act (WIOA) requires Local Workforce Development Boards (LWDBs), in consultation with One-Stop partners and other community service providers to develop a policy regarding supportive services for WIOA-eligible participants enrolled in Adult, Dislocated Worker, and Youth Programs. The One-Stop Operator and Career Service Provider shall adhere to the Supportive Services Policy for Southwest Local Workforce Development Area.

**Action:**

*Who Is Eligible to Receive Supportive Services*

Per WIOA Section 133, funds allocated to a local area may be used to provide supportive services to adults and dislocated workers who:

- Are participating in programs with activities authorized in **WIOA Section 134(c)(1)(A)(ii)** or **WIOA Section 134(c)(1)(A)(iii)**;
- Have exited and need post-program support services as follow-up (for up to 12 months after exit);
- Are unable to obtain such supportive services through other programs providing such services.

These services may include, but are not limited to **(20 CFR 680.900)**:

- Linkages to community services
- Assistance with transportation
- Assistance with child care and dependent care
- Assistance with housing
- Needs-related payments
- Assistance with educational testing
- Reasonable accommodations for individuals with disabilities
- Legal aid services
- Referrals to health care
- Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in post-secondary education classes
- Payments and fees for employment and training-related applications, tests, and certifications

Supportive services for youth, as defined in **WIOA Section 3(59)**, are services that enable an individual to participate in WIOA activities. These services may include, but are not limited to **(20 CFR 681.570)**:

- Linkages to community services
- Assistance with transportation
- Assistance with child care and dependent care
- Assistance with housing
- Needs-related payments
- Assistance with educational testing
- Reasonable accommodations for youth with disabilities
- Legal aid services
- Referrals to health care
- Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in post-secondary education classes
- Payments and fees for employment and training-related applications, tests, and certifications

Supportive services will only be provided when the services are not available elsewhere as WIOA is considered funding of last resort. Supportive services are not entitlements and must be supported by demonstration of financial need. Supportive service documentation must be provided in the participant's case file and the need for the service must be noted on the Individual Employment Plan (IEP) or the Individual Service Strategy (ISS). When multiple options are available for receiving supportive services, different avenues will be contacted and documentation from each avenue will be provided and uploaded into the participant's file in order to denote a reasonable effort was made to determine and choose the lowest, competitively priced service available.

#### *Needs-Related Payments*

Funds allocated to a local area for adults under **WIOA Section 133(b)(2)(A)** or **WIOA Section 133(b)(3)** and funds allocated to the local area for dislocated workers under **WIOA Section 133(b)(2)(B)** may be used to provide needs-related payments to adults and dislocated workers, respectively, who are unemployed and do not qualify for (or have ceased to qualify for) unemployment compensation. In order to receive needs-related payments, **Adults and Out-of-School Youth (OSY) Aged 18-24 must:**

- Be unemployed;
- Not qualify for, or have ceased qualifying for, unemployment compensation; and
- Be enrolled in a program of training services under **WIOA Section 134(d)(4)**.

The payment level for needs-related payments for **Adults and Out-of-School Youth (OSY) Aged 18-24** will be \$1.00 per hour, not to exceed a maximum of \$30 per week, for each clock hour present while enrolled in an approved WIOA program at an approved WIOA institution. A Time and Attendance Sheet, signed by the participant and initialed by the classroom training instructor at the training institution, must be submitted by the participant to the Career Specialist. Career Specialist will review for accuracy and submit to the Career Service Provider for reimbursement to the participant. A copy of the Time and Attendance Sheet will be uploaded into the VOS system under the participant file and the appropriate support service activity will be entered into VOS.

In order to receive needs-related payments, **Dislocated Workers must:**

- Be unemployed, and **(20 CFR 680.950)**:
  - 1) Have ceased to qualify for unemployment insurance or trade readjustment allowance under TAA; and
  - 2) Be enrolled in a program of training services under **WIOA Section 134(d)(4)** by the end of the 13<sup>th</sup> week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated worker, or, if later, by the end of the 8<sup>th</sup> week after the worker is informed that a short-term layoff will exceed 6 months; or
- Be unemployed and unable to qualify for unemployment insurance or trade readjustment assistance under TAA and be enrolled in a program of training services under **WIOA Section 134(c)(3)**.

The payment level for needs-related payments for **Dislocated Workers** shall not exceed the greater of **(20 CFR 680.970)**:

- The applicable weekly level of unemployment insurance compensation for participants who were eligible for unemployment insurance compensation as a result of a qualifying dislocation; or
- The poverty level for an equivalent period, for participants who did not qualify for unemployment compensation as a result of the qualifying layoff. The weekly payment level must be adjusted to reflect changes in total family income, as determined by SOUTHWEST LWDB's self-sufficiency policy.

A bi-weekly Time and Attendance Sheet, signed by the participant and initialed by the classroom training instructor at the training institution, must be submitted by the participant to the Career Specialist or the TAA Specialist. Career Specialist or TAA Specialist will review for accuracy and submit to the Career Service Provider or the State of TN, respectively, for reimbursement to the participant. A copy of the Time and Attendance Sheet will be uploaded into the VOS system under the participant file and the appropriate support service activity will be entered into VOS.

### *Child Care*

~~Child care support services may be available in the amount not to exceed \$25.00 per week for one child per household for WIOA participants who are in need of child care in order to complete a WIOA training program. A child care contract must be developed and submitted for approval with a licensed child care facility. Once a contract is in place, the child care facility will submit bi-weekly invoices for reimbursement. A copy of the child care contract and all invoices will be uploaded into the VOS participant file.~~

Child care may be provided for dependents 0-12 years of age limited to \$2,400 per year per participant. Rates shall be as follows:

- |  |   |          |
|--|---|----------|
| • Full-time care (2 years and under)   | - | \$34/day |
| • Full-time care (2-5 years)           | - | \$30/day |
| • Children (6-12 years)                | - | \$20/day |
| • Part-time care (before/after school) | - | \$10/day |

Child care may be provided by individuals as well as a licensed day care facility.

### *Transportation Assistance*

#### Gas Cards

It shall be the policy of SWLWDB to issue gas cards to WIOA-eligible individuals enrolled as an Adult, Dislocated Worker or Youth. Such individuals may receive a gas card in \$25.00 denominations not to exceed \$100 per month when attending an approved program at a training provider who is on the WIOA Eligible Training Provider List within the same county the participant resides. Individuals residing outside the county where the approved training provider is located will be eligible to receive a gas card in the amount of \$50.00 per month. Also if a participant is searching for a job or is employed and deemed as needing assistance, gas cards may be issued. Gas card determination for a participant must be decided upon by each participant's individual need in order to complete the training and will be authorized by the WIOA participant's assigned County Career Specialist.

Gas cards will be distributed to eligible WIOA participants on the first weekday (Monday-Friday) of each month as long as the participant was enrolled in training on the 15<sup>th</sup> of the previous month. Documentation of this must be provided each month in order for gas card to be reloaded with additional \$25.00 for the next month by submission of attendance records verified by instructor or counselor signature from the training facility. Career Specialists will also contact training facility officials at least quarterly to insure participant is attending regularly and making satisfactory progress. Career Specialist should document their contacts through participant case notes in the Jobs4TN (VOS) website system.

Gas cards may also be issued to WIOA-eligible Youth participants when enrolled in work experience component, as well as when attending an approved program at facility on Eligible Training Provider List. The same process for issuance/reload/documentation will be in effect for Youth as for Adult and Dislocated Worker eligible WIOA participants.

Participants may continually receive this assistance until completion of the training (not to exceed two years) if proper documentation, regular attendance, and satisfactory progress is maintained by the participant. Also, exited participants in need of post-program supportive services as follow-up services may receive this assistance for up to 12 months after exit.

The following steps will be completed prior to a participant receiving a gas card:

1. Career Specialists will determine a participant's need for supportive services as a part of the initial and on-going assessment.
2. The participant must prepare a personal budget verifying that he/she does not currently have the financial resources to obtain the service.
3. Career Specialists will determine whether other community resources are available to cover necessary expenses and show evidence of referrals to other resources, including, when feasible, outcomes of the referral.
4. Career Specialists will submit a written request to the WIOA Team Lead for approval. The request must include the participant's name, State ID (SID) number, and justification for the service.
5. Career Specialists must maintain a tracking log located in the participant's file that tracks the date of the service, type of service, amount of the service disbursed to the participant and a current total of supportive services spent-to-date.
6. Career Specialists will enter on the IEP in the Jobs4TN (VOS) all supportive services on the date the service was provided as well as enter a participant case note in the system.

#### Travel Reimbursement

In lieu of gas cards, a participant may receive travel reimbursement (based on miles driven to training) at the following rates:

- |                       |   |             |
|-----------------------|---|-------------|
| • 1-10 one-way miles  | - | \$ 7.00/day |
| • 11-20 one-way miles | - | \$10.00/day |
| • 21+ one-way miles   | - | \$13.00/day |

The Time and Attendance Sheet (Attachment 1) must be submitted in order to receive travel reimbursement.

### *Vehicle Repair*

Vehicle repair, limited to \$1,000 per year, may be awarded for vehicles registered to the participant. This award may be for, but not limited to, tires, vehicle repairs, and mechanical repairs. Any repair/parts/support exceeding \$500 must have a minimum of three (3) estimates.

### *Medical Care*

A participant may receive up to \$1,000 per year for eye exam/glasses, dental services, hearing aids, or additional medical needs in order to enter or maintain employment, etc.

### *Workforce Development & Training Supplies*

There is no cost limits on required books and supplies for any post-secondary training. Other basic supplies that are not mandatory will be limited to \$150 per term. Any employed participant may receive up to \$1,000 per year on supplies needed for the employment.

### *Tutoring*

A Youth participant enrolled in training who is not making satisfactory grades may receive tutoring services from a licensed professional. Payment for a licensed professional conducting tutoring is capped at \$15.00/hr. not to exceed 5 hours per week. Yearly limited amount is \$200.

### *Incentives (Youth Only)*

Incentives in the following amounts may be paid to youth:

- HISET: \$100 for attending 4 classes after orientation totaling 12 class hours
- \$100 for completing the HISET voucher
- \$250 for completion of HISET
- \$100/quarter for milestone placement in Q1-Q4 after exit

### *Emergency Supportive Services*

WIOA funds can be used when a current participant has an emergency arise while actively participating in WIOA career or training activities which would prevent the continuation of their attendance. The purpose of the funds must be documented. Payments made to the participant require a copy of the bill or receipt *listing the participant as the debtor* attached to the authorization. Rent/Housing payments will require a copy of a lease agreement naming the participant. Authorizations to vendors for items should be returned with proof (a signature) that the person received the items. The following are cost limits, per service/per year, established by SWLWDB:

- Utilities (electric, gas, water)                   \$500/year
- Rent/Housing   \$750/year
- Phone Service/Internet/Data Plan               \$250/year
- Automobile Insurance                               \$350/year

*Exceptions*

Waivers may be granted on a case-by-case basis subject to the approval of SWLWDB Executive Committee.

*Unallowable Support Services*

Support services may not be used to pay for expenses incurred prior to the participant's enrollment into the WIOA program. Management will document and approve any support service payments. An advance payment against future payments is now allowed. Some examples of unallowable services include, but are not limited to, the following:

- Fines and penalties such as traffic violations, late finance charges, and interest payments
- Entertainment, including tips
- Contributions and donations
- Vehicle or mortgage payments
- Refund deposits
- Alcohol or tobacco products
- Pet food
- Items to be purchased for family or friends
- Out-of-state job search and relocation expenses that will be paid by the prospective employer

*Priority of Service*

WIOA participants facing significant barriers to employment, such as recipients of public assistance, low-income individuals, or individuals who are basic skills deficient, will be given service at the level of their particular need. Please refer to the Tennessee Department of Labor and Workforce Development website at <http://www.tn.gov/workforce/article/wioa-technical-assistance> regarding the order of service delivery.

*Duplication of Services*

Funds for supportive services will be monitored to ensure spending is made in a manner that is not redundant. Co-enrollment of participants in multiple programs will be made in order to leverage resources for maximum benefit to the participant.

**Contact:**

Questions regarding this policy should be addressed to Jimmy Bell, SOUTHWEST LWDB Director, at SWHRA, 1527 White Avenue, P.O. Box 264, Henderson, TN 38340. Phone: (731) 983-3688. Email: [jbell@swhra.org](mailto:jbell@swhra.org).

**Attachment**

Time and Attendance Sheet



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Craig S. Butler, Board Chairman



Last 4 of SS: \_\_\_\_\_

County of Service: \_\_\_\_\_

Mid Cumberland Human Resource Agency  
WorkForce Services

Participant Work Travel Claim - **Job Search**  
\_\_\_\_\_ Program

Name: \_\_\_\_\_ State ID: \_\_\_\_\_

Mailing Address: \_\_\_\_\_  
Street City State Zip Code

Travel Period Beginning: \_\_\_\_\_ Ending: \_\_\_\_\_

Record of Attendance:

													TOTAL DAYS
Dates of Job search													=

One-Way Miles Driven Per Day: \_\_\_\_\_

**Request for Travel Payments**

As authorized by the Local Workforce Development Board, travel payments will be paid at the amount of \$ \_\_\_\_\_ per day for each day a participant actively pursued employment.

Job Searched for \_\_\_\_\_ days x \$ \_\_\_\_\_ per day = \$ \_\_\_\_\_

**WorkForce Services**

This is to certify that the above information is true and verified by a Career Specialist.

\_\_\_\_\_  
WIOA Participant Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
WIOA Career Specialist Signature

\_\_\_\_\_  
Date

**\*\*Employment verification form must accompany the first travel claim to verify employment\*\***

*\*DISCLOSURE STATEMENT: The WIOA staff person making the determination of eligibility for WIOA services and signing this form is not related to the applicant/participant or a close personal acquaintance of the applicant/participant.*





## ETA WIOA 9091 Annual: Annual Summary

Please note this data was last refreshed on 10/15/2018

## Filter Criteria

Report Period: PY-2017  
 Region/LWIA: Southwest Tennessee

Report Due Date: 10/1/2018

Date: 12/20/2018

Report End Date: 6/30/2018

State: TN

Table B - Adult Program Results

Reported Information	Negotiated Performance Level	Actual Performance Level	
Entered Employment Rate		83.3%	45
			54
Employment Retention Rate		97.0%	97
			100
Average Earnings		\$14,741.4	\$1,341,471
			91
Employment & Credential Rate		35.3%	42
			119

Table C - Outcomes for Adult Special Populations

Reported Information	Public Assistance Recipients Receiving		Veterans		Individuals with Disabilities		Older Individuals	
Entered Employment Rate	94.1%	16	100.0%	1	100.0%	1	66.7%	2
		17		1		1		3
Employment Retention Rate	100.0%	23	100.0%	1	0.0%	0	100.0%	1
		23		1		0		1
Average Earnings	\$13,649.9	\$300,298	\$14,955.5	\$14,955	\$0.0	\$0	\$12,977.0	\$12,977
		22		1		0		1
Employment & Credential Rate	56.0%	14	0.0%	0	0.0%	0	0.0%	0
		25		1		0		4

**ETA WIOA 9091 Annual – Local Performance**

**Filter Criteria**

Report Period: 2017  
 Region/LWIA: Southwest Tennessee

	Measure	Customer Group / Region / Office	Total
	Total Participants	Adults	2,585
		Dislocated Workers	64
		Older Youth (19 - 21)	134
		Younger Youth (14 - 18)	128
	Total Exitters	Adults	4,532
		Dislocated Workers	30
		Older Youth (19 - 21)	55
		Younger Youth (14 - 18)	52

	Measure	Customer Group / Region / Office	Negotiated Performance Level	Actual Performance Level
	Entered Employment Rates	Adults		82.6%
		Dislocated Workers		86.9%
		Older Youth (19 - 21)		77.5%
	Retention Rates	Adults		90.4%
		Dislocated Workers		92.5%
		Older Youth (19 - 21)		87.9%
		Younger Youth (14 - 18)		78.6%
	Average Earnings	Adults		\$14,066.9
		Dislocated Workers		\$18,375.8
		Older Youth (19 - 21)		\$5,744.3
	Credential / Diploma Rates	Adults		54.5%
		Dislocated Workers		50.4%
		Older Youth (19 - 21)		14.8%
		Younger Youth (14 - 18)		40.5%
	Skill Attainment Rate	Younger Youth (14 - 18)		24.6%
	Placement in Employment or Education	Youth (14 - 21)		77%
	Attainment of Degree or Certificate	Youth (14 - 21)		61.1%

**Table P - Veteran Priority of Service**

Reported Information	Total	Percent Served
Covered Entrants Who Reached the End of the Entry Period	66	
Covered Entrants Who Received a Service During the Entry Period	66	100.0%
Covered Entrants Who Received a Staff-Assisted Service During the Entry Period	2	3.0%

**Table Q - Veteran' s Outcomes by Special Populations**

Reported Information	Post 9/11 Era Veterans	Post 9/11 Era Veterans who	TAP Workshop Veterans
Entered Employment Rate	100.0%	1	100.0%
		1	
Employment Retention Rate	100.0%	1	0.0%
		1	
Average Earnings	\$14,955.5	\$14,955	\$0.0
		1	

**Table O - Local Performance**

Table O - Local Performance			
Local Area Name Southwest Tennessee	Total Participants Served	Adults	2,585
		Dislocated Workers	64
		Older Youth (19 - 21)	133
		Younger Youth (14 - 18)	128
ETA Assigned # 47160	Total Exiters	Adults	4,532
		Dislocated Workers	30
		Older Youth (19 - 21)	55
		Younger Youth (14 - 18)	52
Reported Information		Negotiated Performance Level	Actual Performance Level
Entered Employment Rates	Adults		83.3%
	Dislocated Workers		100.0%
	Older Youth (19 - 21)		73.9%
Retention Rates	Adults		96.8%
	Dislocated Workers		100.0%
	Older Youth (19 - 21)		100.0%
	Younger Youth (14 - 18)		88.5%
Average Earnings	Adults		\$14,066.9
	Dislocated Workers		\$18,030.5
	Older Youth (19 - 21)		\$4,397.7
Credential / Diploma Rates	Adults		37.5%
	Dislocated Workers		37.5%
	Older Youth (19 - 21)		14.8%
	Younger Youth (14 - 18)		40.5%
Skill Attainment Rate	Younger Youth (14 - 18)		24.6%
Placement in Employment or Education	Youth (14 - 21)		70.9%
Attainment of Degree or Certificate	Youth (14 - 21)		61.1%
Literacy & Numeracy Gains	Youth (14 - 21)		0.0%

**Table L - Other Reported Information**

Reported Information	12-Mth Employment Retention Rate		12-Mth Earnings Increase / Replacement		Non-Traditional Employment		Wages at Entry to Employment		Training-Related Employment	
	Adults	97.8%	88 90	\$6,070.2	\$503,830 83	4.4%	2 45	\$6,124.5	\$244,978 40	81.5%
Dislocated Workers	100.0%	7 7	116.2%	\$115,938 \$99,743	6.3%	1 16	\$8,646.6	\$121,053 14	81.8%	9 11
Older Youths	100.0%	10 10	\$7,342.9	\$66,086 9	5.9%	1 17	\$3,162.4	\$53,760 17		

**Table M - Participation Levels**

Reported Information	Total Participants Served	Total Exiters
Total Adult Customers	2,683	4,569
Total Adult Self-Service Only	2,300	4,374
WIOA Adult	2,620	4,539
WIOA Dislocated Worker	64	30
Total Youth (14 - 21)	262	107
Younger Youth (14 - 18)	128	52
Older Youth (19 - 21)	134	55
Out-of-School Youth	170	92
In-School Youth	38	15

**Table I - Outcomes for Older Youth Special Populations**

Reported Information	Public Assistance Recipients		Veterans		Individuals with Disabilities		Out-of-School Youth	
Entered Employment Rate	69.2%	9	0.0%	0	100.0%	1	77.3%	17
		13		0		1		22
Employment Retention Rate	100.0%	9	0.0%	0	100.0%	1	100.0%	19
		9		0		1		19
Average Earnings	\$6,703.6	\$53,629	\$0.0	\$0	\$3,997.8	\$3,998	\$4,397.7	\$79,159
		8		0		1		18
Employment & Credential Rate	15.4%	2	0.0%	0	0.0%	0	15.4%	4
		13		0		1		26

**Table J - Younger Youth (14 - 18) Program Results**

Reported Information	Negotiated Performance Level	Actual Performance Level	
Skill Attainment Rate		24.6%	14
			57
Youth Diploma or Equivalent Rate		40.5%	15
			37
Employment Retention Rate		88.5%	46
			52

**Table K - Outcomes for Younger Youth Special Populations**

Reported Information	Public Assistance Recipients		Individuals with Disabilities		Out-of-School Youth	
Skill Attainment Rate	29.4%	5	0.0%	0	11.6%	5
		17		0		43
Youth Diploma or Equivalent Rate	61.5%	8	0.0%	0	16.0%	4
		13		0		25
Employment Retention Rate	88.9%	24	66.7%	2	97.1%	33
		27		3		34

**Table G - Other Outcome Information for the Dislocated Worker Program**

Reported Information	Individuals Who Only Received Core Services		Individuals Who Only Received Core and Intensive Services		Individuals Who Received Training Services	
Entered Employment Rate	0.0%	0	100.0%	1	100.0%	15
		0		1		15
Employment Retention Rate	0.0%	0	0.0%	0	100.0%	11
		0		0		11
Average Earnings	\$0.0	\$0	\$0.0	\$0	\$18,030.5	\$180,305
		0		0		10

**Table H.1 - Youth (14 - 21) Program Results**

Reported Information	Negotiated Performance Level	Actual Performance Level	
Placement in Employment or Education		70.9%	39
			55
Attainment of Degree or Certificate		61.1%	22
			36
Literacy & Numeracy Gains		0.0%	0
			0

**Table H.1.A - Outcomes for Youth Special Populations**

Reported Information	Public Assistance		Veterans		Individuals with Disabilities		Out-of-School Youth	
Placement in Employment or Education	66.7%	18	0.0%	0	100.0%	3	76.7%	33
		27		0		3		43
Attainment of Degree or Certificate	81.8%	9	0.0%	0	0.0%	0	50.0%	12
		11		0		0		24
Literacy & Numeracy Gains	0.0%	0	0.0%	0	0.0%	0	0.0%	0
		0		0		0		0

**Table H.2 - Older Youth (19 - 21) Program Results**

Reported Information	Negotiated Performance Level	Actual Performance Level	
Entered Employment Rate		73.9%	17
			23
Employment Retention Rate		100.0%	19
			19
Average Earnings		\$4,397.7	\$79,159
			18
Employment & Credential Rate		14.8%	4
			27

**Table D - Other Outcome Information for the Adult Program**

Reported Information	Individuals Who Only Received Core Services		Individuals Who Only Received Core and Intensive Services		Individuals Who Received Training Services	
Entered Employment Rate	25.0%	2	75.0%	3	95.2%	40
		8		4		42
Employment Retention Rate	90.9%	10	100.0%	2	97.7%	85
		11		2		87
Average Earnings	\$8,940.0	\$89,400	\$11,313.4	\$22,627	\$15,562.6	\$1,229,444
		10		2		79

**Table E - Dislocated Worker Program Results**

Reported Information	Negotiated Performance Level	Actual Performance Level	
Entered Employment Rate		100.0%	16
			16
Employment Retention Rate		100.0%	11
			11
Average Earnings		\$18,030.5	\$180,305
			10
Employment & Credential Rate		37.5%	6
			16

**Table F - Outcomes for Dislocated Worker Special Populations**

Reported Information	Veterans		Individuals with Disabilities		Older Individuals		Displaced Homemakers	
Entered Employment Rate	100.0%	2	0.0%	0	100.0%	3	0.0%	0
		2		0		3		0
Employment Retention Rate	100.0%	1	0.0%	0	0.0%	0	0.0%	0
		1		0		0		0
Average Earnings	\$28,182.2	\$28,182	\$0.0	\$0	\$0.0	\$0	\$0.0	\$0
		1		0		0		0
Employment & Credential Rate	50.0%	1	0.0%	0	33.3%	1	0.0%	0
		2		0		3		0

<b>Tennessee</b>		
<b>Adult</b>		
<i>Federal Performance Indicator</i>	<i>Agreed upon outcome PY 2018</i>	<i>Agreed upon outcome PY 2019</i>
Employment Rate 2nd Quarter After Exit	83.0%	83.5%
Employment Rate 4th Quarter After Exit	83.0%	83.5%
Median Earnings 2nd Quarter After Exit	\$6,633	\$6,650
Credential Attainment within 4 Quarters After Exit	58.0%	59.0%
Measurable Skill Gains		
<b>Dislocated Worker</b>		
<i>Federal Performance Indicator</i>	<i>Agreed upon outcome PY 2018</i>	<i>Agreed upon outcome PY 2019</i>
Employment Rate 2nd Quarter After Exit	81.0%	82.0%
Employment Rate 4th Quarter After Exit	81.0%	82.0%
Median Earnings 2nd Quarter After Exit	\$6,900	\$7,000
Credential Attainment within 4 Quarters After Exit	68.5%	69.0%
Measurable Skill Gains		
<b>Youth</b>		
<i>Federal Performance Indicator</i>	<i>Agreed upon outcome PY 2018</i>	<i>Agreed upon outcome PY 2019</i>
Employment or Ed. Enrollment Rate 2nd Quarter After Exit	79.0%	79.5%
Employment or Ed. Enrollment Rate 4th Quarter After Exit	75.0%	76.0%
Median Earnings 2nd Quarter After Exit	NA	NA
Credential Attainment within 4 Quarters After Exit	70.0%	72.0%
Measurable Skill Gains		

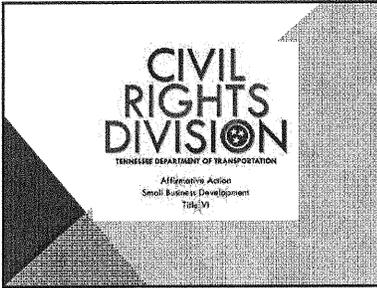
## SOUTHWEST HUMAN RESOURCE AGENCY TITLE VI TRAINING

Trainer: Edna Johnson  
Date: 1-9-19

Name- Please Print	Job Title / Program	Ethnic / Race
Jimmy Bell	Director - WIOA	W
April Brown	Admin. Asst. - WIOA	W
Lucy Locke	Dy. Mgr. - WFOA	W
Kera Hamm	SCSEP/Youth <sup>WIOA</sup> Coordinator	W
Tim Carothers	Re-Entry Coordinator	W

Please return all Title VI rosters to: Edna Johnson

Southwest Human Resource Agency – Title VI Coordinator  
P.O. Box 264  
Henderson, TN 38340



**WHAT IS TITLE VI?  
FEDERAL LAW**  
TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 (42 U.S.C. 20003)

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

**PURPOSE OF TRAINING**

To ensure all management staff, contractees, and service beneficiaries are aware of the provisions of Title VI of the Civil Rights Act of 1964 and the minimum requirements to be in compliance with its rules, laws, and regulations.

**OTHER NONDISCRIMINATION  
AUTHORITIES**

**Expanded the range and scope of Title VI coverage and applicability:**

- The 1970 Uniform Act (42 U.S.C. 4601)
- Section 504 of the 1973 Rehabilitation Act (29 U.S.C. 790)
- Federal Highway Act of 1973 - Gender Added (23 U.S.C. 324)
- The 1975 Age Discrimination Act (42 U.S.C. 6101)
- Executive Order 12898 in Environmental Justice (EJ)
- Executive Order 13166 on Limited English Proficiency (LEP)

**To Comply with Title VI**

- Appoint a Title VI Coordinator
- Obtain TDOT Title VI Training
- Provide Title VI Employee Training for employees
- Develop a Title VI Policy Statement and post in visible areas

- Acquire signed Title VI Assurances
- Monitor ethnicity and gender of contractors and subcontractors
- Include Title VI Assurances in all contracts
- Inform customers about Title VI annually and disseminate information to the public (i.e. website, poster, utility bill, water bill, newspaper, radio, etc.)

**PROMOTE CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES) AND OTHER SMALL, MINORITY AND WOMEN-OWNED UTILIZATION**

Provide the opportunity to participate on TDOT federally funded contracts by means of:

- Outreach to Certified DBEs and other small, minority and women-owned businesses on both goal and non-goal projects;
- Soliciting Certified DBEs and other small, minority and women-owned businesses through all reasonable and available means (e.g. pre-bid meetings, advertisement, TDOT DBE list, etc.);
- Arranging times for presentation of bids, quantities, specifications and delivery schedules in ways that facilitate DBEs participation;
- Ensuring that bid notices and requests for proposals are available to (DBEs) in a timely manner, and
- Advertising with local media resources and minority newspapers.

**DEVELOP A  
PUBLIC PARTICIPATION PLAN**

Engage the Public with the opportunity to make them aware of projects or services and to provide input in the decision-making process through:

- Public Meetings/Hearings in centralized locations;
- Advertisement with Local Media Resources and Minority Newspapers;
- Direct Mailings;
- Public Service Announcements;
- Website, and
- Radio and Television.

**ENSURE YOUR CONTRACTORS AND  
SUB-CONTRACTORS FOLLOW THE  
SAME GUIDELINES**

Sub-recipients must ensure that all contractors and sub-contractors awarded TDOT funded contracts adhere to Title VI and all other applicable civil rights laws and regulations.

**MINORITY AND WOMEN REPRESENTATION ON PLANNING BOARDS & COMMISSIONS**

The inclusion of minorities and women on planning boards and commissions is critical in establishing an equal access planning system. Sub-recipients cannot "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program."

**HAVE A WRITTEN TITLE VI COMPLAINT PROCESS AND COMPLAINT LOG**

**To include:**

- How to file a complaint.
- The complaint must be filed within 180 days of the alleged occurrence or when the alleged discrimination became known to the complainant.
- The complaint should be in writing and signed.
- Determining the jurisdiction, acceptability, and the need for additional information upon receipt to investigate the merit.
- Complaints filed against the sub-recipient should be forwarded to DOT for investigation.
- Take final action within 60 days, and
- Provide appeal instructions.

**HAVE A LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

**How do you assist customers that do not speak English?**

**EXECUTIVE ORDER 13166**

Limited English Proficiency (LEP) - EO 13166 requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them.

**LIMITED ENGLISH PROFICIENCY (LEP)**

**Who is a LEP Person?**

Does not speak English as their primary language, and has a limited ability to read, speak, write or understand English.

**TAKE REASONABLE STEPS TO ENSURE MEANINGFUL ACCESS TO PROGRAMS AND ACTIVITIES OF LEP PERSONS**

Conduct an assessment of the population by using the:  
Four Factor Analysis

1. Number or proportion of LEP persons;
2. Frequency of contact with the program or activity;
3. Nature and importance of the program; and
4. Resources available.

**EVALUATE CURRENT PRACTICES**

- Identify actions already being taken and existing tools that can be used to provide meaningful access
- Inventory existing materials that have been translated into other languages
- Staff awareness
- Response Plan

**EXECUTIVE ORDER 12898**

Environmental Justice (EJ) - EO 12898, each Federal agency must identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.

**DEVELOP AN ENVIRONMENTAL JUSTICE PROCESS**

**That:**

- Aims for fair treatment and protection from environmental hazards for all;
- Provides meaningful involvement in decision-making means inclusive and accessible for all people;
- Provides good community impact assessments addressing the concerns of all people;
- Documents efforts taken to identify and engage minority and low-income populations, and
- Provides an analysis for each alternative that offsets the benefits needed to be considered before making a determination.

**NON-COMPLIANCE**

Failure or refusal to comply with Title VI of the Civil Rights Act of 1964, other applicable Civil Rights Laws, and implementing departmental regulations.

**SANCTIONS FOR NON-COMPLIANCE**

- Withholding of payments to the recipient under the contract until the recipient complies, and/or
- Cancellation, termination or suspension of the contract, in whole or in part

**TITLE VI RELATED VIDEOS**

Included are the U.S. Department of Justice videos for optional learning as follows:

**UNDERSTANDING AND ABIDING BY TITLE VI VIDEO**



**LIMITED ENGLISH PROFICIENCY VIDEO**



**TITLE VI PROGRAM STAFF**

Phone: 615.741.3581 Fax: 615.741.3150  
Toll Free: 1.888.370.3647

Cynthia Howard Title VI Program Director	Statewide
Kelsey Finch Title VI Program Specialist	Regions 1 & 2
Pamela Sharp Title VI Program Specialist	Region 3
James W. White Title VI Program Specialist	Region 4

**CIVIL RIGHTS DIVISION**  
TENNESSEE DEPARTMENT OF TRANSPORTATION

Affirmative Action  
Small Business Development  
Title VI

**Diversity is Power**

Mid-Cumberland  
Annual Title VI Training



WEDNESDAY, DECEMBER 19, 2018

What is Title VI?

- o Title VI is a Federal Law which prohibits discrimination on the basis of race, color, or national origin.
- o "No person in the United States shall on the basis of race, color or national origin, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Civil Rights Act of 1964



What are Civil Rights?

*o Civil Rights are enforceable rights or privileges guaranteed by the 13<sup>th</sup> and 14<sup>th</sup> Amendments to the U.S. Constitution, which if interfered with by another gives rise to an action for injury.*

**Examples:**

- \*Freedom of Speech
- \*Freedom of Assembly
- \*Right to Vote
- \*Freedom from Involuntary Servitude
- \*Equality in Public Places

Discrimination

*Discrimination occurs when an individual's civil rights are denied or interfered with because of their membership in a particular group or class.*

For Title VI to Apply

1. The program or agency must be located within the United States.
2. The program or agency must be providing a service.
3. The program or agency must be receiving direct (recipient) or indirect (sub-recipient) federal funding or assistance.

What constitutes a program or activity?

- o A department, agency or other instrumentality of a state or local government.
- o The entity of such a state or local government that distributes assistance and each department or agency to which assistance is extended.

Prohibited Practices

- o Denying any individual services, opportunities, or other benefits for which that individual is otherwise qualified;
- o Providing any service or benefit in a different manner from that which is provided to others in a program because of race, color, or national origin;
- o Segregating service recipients solely of race, color, or national origin;

Prohibited Practices

- o Restricting access to program services or benefits because of race, color, or national origin;
- o Adopting methods of administration which would limit participation by any group of recipients or subject them to discrimination;
- o Addressing an individual in a manner that denotes inferiority because of race, color, or national origin.

**Limited English Proficiency**

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*Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.*

- o These individuals may be entitled to language assistance with respect to a particular type or service, benefit, or encounter

**LEP Requirements**

Recipients and sub-recipients of federal assistance are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Four factors that should be considered:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
2. The frequency with which LEP individuals come into contact with the program;
3. The nature and importance of the program, activity, or service provided by the program to people's lives; and
4. The resources available to the grantee/recipient or agency, and costs.

**Service Provider Requirements**

- o Service providers must have a process for advising service recipients of their rights under Title VI of the Civil Rights Act of 1964 and how to file a discrimination complaint.
- o Title VI posters must be displayed in a conspicuous place and accessible to all service recipients.
- o Service providers must provide conduct annual Title VI training.

**Key to Title VI Compliance**

---

Ensure that service recipients receive



- o Equal treatment
- o Equal access
- o Equal rights
- o Equal opportunities

Without regard to their race, color, or national origin including Limited English Proficiency (LEP).

**Allegations of Discrimination Title VI**

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Any person who believes a person has been subjected to discrimination on the basis of race, color or national origin, may file a written complaint of discrimination. The complaint must be filed within 180 days after the date of the alleged discrimination.

**How to report a Title VI violation or complaint:**

---

Please contact the agency's Title VI Coordinator:

Karyssa Helton  
[khelton@mchra.com](mailto:khelton@mchra.com)  
 615-560-0211

**Thank you!!!**

Вопросы  
**Questions**  
 ερώτηση  
 פראגע  
**Frage**  
 Domanda?  
 ?  
 질문  
**Pitanje**  
 kesyon  
 السؤال

kwestia  
 pergunta

Welcome to  
Mid-Cumberland Human Resource Agency  
New Hire Orientation

Monday, November 5th, 2018

Agenda

- 9:00 – 09:30 AFLAC Info Session –  
9:30 – 10:15 Agency Orientation – Leah Boyd  
10:15 – 10:45 Harassment Video Info Session  
10:45-11:15 Title VI Training Video

Employee Name (Please Print): Roamell Bostick  
Employee Signature: Roamell Bostick  
Employee Program/County: Chester

Title VI Video

Employee Signature: Roamell Bostick

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Employee Name (Please Print): HARVEY BUCHANAN

Employee Signature: Harvey Buchanan

Employee Program/County: Madison

Title VI Video

Employee Signature: Harvey Buchanan

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Employee Name (Please Print): Sarah Casteel

Employee Signature: Sarah Casteel

Employee Program/County: Workforce Services - Hardin

Title VI Video

Employee Signature: Sarah Casteel

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Employee Name (Please Print): Tonja Alexander  
Employee Signature: Tonja Alexander  
Employee Program/County: WTA / Henderson

Title VI Video

Employee Signature: Tonja Alexander

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Employee Name (Please Print): Brenda Fowler

Employee Signature: Brenda Fowler

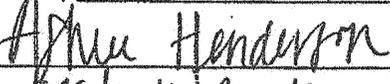
Employee Program/County: WFOA / Madison

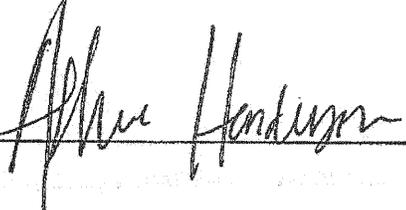
Title VI Video  
Employee Signature: Brenda Fowler

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Employee Name (Please Print): Ashlee Henderson  
Employee Signature:   
Employee Program/County: ACC/WIOA - Haywood

Title VI Video  
Employee Signature: 

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10:45-11:15	Title VI Training Video

Employee Name (Please Print): Velma Holt

Employee Signature: Velma Holt

Employee Program/County: Work Force Service Hardin A.S.C

**Title VI Video**

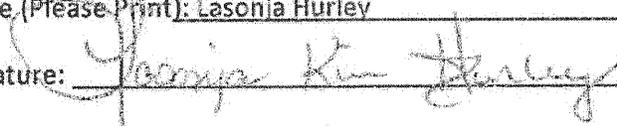
Employee Signature: Velma Holt

**Welcome to**  
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**Monday, November 5th, 2018**

**Agenda**

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- 10:45-11:15           Title VI Training Video

Employee Name (Please Print): Lasonia Hurley

Employee Signature: 

Employee Program/County Madison

Title VI Video

Employee Signature: 

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- 10:45-11:15          Title VI Training Video

Employee Name (Please Print): Jana James  
Employee Signature: Jana James  
Employee Program/County: CSM / Southwest

Title VI Video  
Employee Signature: Jana James

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- 10:45-11:15           Title VI Training Video

Employee Name (Please Print): Ariel McGahay

Employee Signature: Ariel McGahay

Employee Program/County: Workforce Services / Madison

Title VI Video

Employee Signature: Ariel McGahay

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- 10:45-11:15      Title VI Training Video

Employee Name (Please Print): JANET McLEMORE

Employee Signature: *Janet S. McMore*

Employee Program/County: WSDA/MONROE

**Title VI Video**

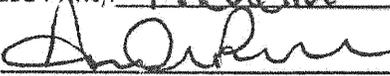
Employee Signature: *Janet S. McMore*

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- 10:45-11:15    Title VI Training Video

Employee Name (Please Print): Aneadra Pearson

Employee Signature: 

Employee Program/County: Haywood

Title VI Video  
Employee Signature: 

**Welcome to**  
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**New Hire Orientation**  
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- |               |                                |
|---------------|--------------------------------|
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| 10:15 – 10:45 | Harassment Video Info Session  |
| 10:45-11:15   | Title VI Training Video        |

Employee Name (Please Print): Judith Putman

Employee Signature: Judith Putman

Employee Program/County: WIOA / Madison County

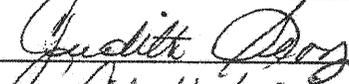
Title VI Video

Employee Signature: Judith Putman

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Employee Name (Please Print) Judith Seay  
Employee Signature:   
Employee Program/County: Adult / Dislocated Worker

Title VI Video  
Employee Signature: 

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- 10:45-11:15      Title VI Training Video

Employee Name (Please Print): Tomeco N. Scott  
Employee Signature: Tomeco N. Scott  
Employee Program/County: Youth / Hardeman

Title VI Video  
Employee Signature: Tomeco N. Scott

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- 10:15 – 10:45           Harassment Video Info Session
- 10:45-11:15           Title VI Training Video

Employee Name (Please Print): Merita Stone

Employee Signature: *Merita Stone*

Employee Program/County: Madison

**Title VI Video**

Employee Signature: *Merita Stone*